

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

MILESTONE CONDOMINIUM ASSOCIATION
a Washington nonprofit corporation,

Plaintiff,

v.

STATE FARM FIRE & CASUALTY
COMPANY, an Illinois Company; and DOE
INSURANCE COMPANIES 1-10,

Defendants.

No. C17-832 RSM

**STIPULATED MOTION AND ORDER
TO CONTINUE DEADLINE FOR
EXCHANGE OF EXPERT WITNESS
DISCLOSURE/REPORTS PURSUANT
TO FED. R. CIV. P. 26(a)(2)**

STIPULATED MOTION

Come now, the Parties to the above-entitled action, by and through their respective counsel, and stipulate to this motion for a continuance of the expert disclosure deadline.

Currently, the expert disclosure deadline is scheduled for February 21, 2018. The parties stipulate to a continuance of this deadline to March 16, 2018 (a continuance of twenty-three (23) days) to provide the parties' expert witnesses with additional time to finalize their opinions.

Therefore, the parties stipulate to this motion for a short continuance of the following date:

///

///

///

	Current Deadline	Proposed Deadline
Expert Disclosure Deadline	February 21, 2018	March 16, 2018

Pursuant to LR 16(b)(5) a scheduling Order may be modified “only for good cause and with the judge’s consent.” In this matter, an extension of the expert disclosure deadline will provide the parties’ expert witnesses additional time to finalize their opinions. Additionally, the Association’s expert consultant, Martin Flores of Dimensional Building Consultants, will be out of state and unreachable during the week expert disclosures are due.

The parties continue to diligently pursue discovery in this matter. Both parties have exchanged written discovery. Additionally, the parties have agreed to promptly provide available deposition dates for the following witnesses:

- The Association’s expert consultant, Martin Flores (late March);
- The Association’s Fed.R.Civ.P. 30(b)(6) (in late February or early March);
- State Farm’s Fed.R.Civ.P. 30(b)(6) (in late March or early April);
- State Farm’s expert consultant, JRP Engineering (early April).

This extension of the expert disclosure deadline will not change any other dates or events contained in the Order Setting Trial Date and Related Dates (Dkt. #12).

DATED this 31st day of January, 2018.

STEIN, SUDWEEKS & HOUSER, PLLC

/s/ Jessica R. Burns

Justin Sudweeks, WSBA #28755

Jessica R. Burns, WSBA #49852

2701 First Avenue, Suite 430

Seattle, WA 98121

Telephone: (206) 388-0660

Facsimile: (206) 286-2660

Email: justin@condodefects.com

jessica@condodefects.com

1 Attorneys for Plaintiff Milestone Condominium
2 Association

3 REED MCCLURE

4 /s/ Jessica R. Burns, WSBA 49852, for Michael Rogers, via
5 email authorization 01/30/2018

6 Michael Rogers, WSBA #16423

7 1215 Fourth Avenue, Suite 1700

8 Seattle, WA 98161

9 Telephone: (206) 292-4900

10 Facsimile: (206) 223-0152

11 Email: mrogers@rmlaw.com

12 Attorney for Defendant State Farm

13 **ORDER**

14 Based on the above stipulation, IT IS SO ORDERED that the expert disclosure deadline is
15 continued from February 21, 2018 to March 16, 2018. No other deadlines or events are altered.

16 DATED this 2nd day of February 2018.

17 

18 RICARDO S. MARTINEZ

19 CHIEF UNITED STATES DISTRICT JUDGE